CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD

SAN FRANCISCO BAY REGION

ORDER NO. 93-150

AMENDMENT TO ORDER NUMBERS 90-114 & 91-112
SITE CLEANUP REQUIREMENTS FOR:

PETERBILT MOTORS COMPANY
38801 CHERRY STREET
NEWARK, ALAMEDA COUNTY

The California Regional Water Control Board, San Francisco Bay Region (hereinafter called the Board) finds that:

1. SITE DESCRIPTION. Peterbilt Motors Company (hereinafter called the Discharger) operated a truck manufacturing plant at 38801 Cherry Street in Newark, California from 1962 until October of 1986. At this 36 acre site, chemicals which were stored and/or used include diesel fuel, gasoline, organic solvents, paints, and other organic chemicals. Peterbilt has identified six areas of environmental concern as follows:

   . underground storage tanks (Area 1)
   . pipeline/utility conduits (Area 2)
   . aboveground tank farm/wastewater treatment plant (Area 3)
   . hydraulic lift pit (Area 4)
   . oil spill (Area 5)
   . surface impoundment/waste evaporation ponds (Area 6)

2. STATUS OF INVESTIGATIONS. Investigative activities completed to date include collection of numerous soil samples from soil borings and soil excavations and collection of numerous groundwater samples from on-site monitoring and extraction wells. Shallow Zone hydrogeology was evaluated based on soil boring data and through the performance of groundwater pump tests in Areas 1 and 2. Remedial activities completed at the facility include closure of Areas 3 and 6; excavation of underground tanks, pipelines, utilities, hydraulic lifts, piping, and soil in Areas 1,2,4 and 5; on-site treatment via volatilization and bioremediation followed by off-site disposal of about 3,600 cubic yards of soil excavated from Area 2. In addition, an ongoing groundwater remediation system extracts groundwater from the Shallow Zone and treats groundwater using aeration as permitted by Bay Area Air Quality Management District. Treated groundwater is discharged to the sanitary sewer as permitted by the Union Sanitary District.

3. COMPLIANCE WITH ORDERS 90-114 & 91-112. The Discharger has complied with all the time tasks outlined in Provision C.1.a to C.1.i. The Discharger is currently in partial compliance with Provision C.1.j. Some amendments to the requirements for report

submittal stated in Provisions C.2 and C.4 are appropriate.

Provision C.1.j requires a report documenting implementation of the preferred remediation as selected in Provision C.1.h. The Discharger submitted a letter report on August 19, 1993, summarizing the rationale for using the ongoing interim groundwater remedial action as the only alternative of Shallow Zone cleanup options. The implementation of this alternative has been documented in Monthly Summary Reports and other submittals to the Board. The Discharger also commits to continue to implement long-term Shallow Zone cleanup by operating the existing groundwater extraction and treatment system until steady groundwater chemical concentrations are obtained. At that time, the discharger may perform a site-specific, health-based risk assessment for the residual pollution, recommend appropriate risk management measures and develop and propose alternate compliance points to fulfil the intent of Specification B.5 of Order No. 90-114. In addition, the corporate management of the Discharger plans to retain the site ownership without altering the industrial use of the site.

Provision C.2 requires the Discharger to submit quarterly monitoring reports summarizing groundwater quality sampling of on-site wells. Groundwater monitoring data collected to date have shown that the chemical concentrations in groundwater have been reduced to moderate to low levels. The Discharger shall continue to perform quarterly groundwater monitoring in accordance with a groundwater sampling plan. The plan shall be approved by the Executive Officer. However, continued submission of quarterly reports is deemed unnecessary. Only Annual Reports as required by Provision C.3 are appropriate.

Provision C.4 requires a monthly report documenting implementation of the shallow zone remedial alternative. The discharger will use the existing groundwater extraction and treatment system as the shallow zone cleanup alternative. The requirement of monthly reports to update an ongoing and steady groundwater treatment system is deemed unnecessary. Therefore, Provision C.4 is no longer necessary.

4. SCOPE OF THIS ORDER - This Order proposes to amend due dates and some task requirements specified under Board Order Nos. 90-114 and 91-112 due to facts cited in Finding 3 above. These findings support the changes to streamline reporting of on-site conditions and to allow groundwater cleanup to site-specific levels. All other Prohibitions, Specifications and Provisions of Order Nos. 90-114 and 91-112 shall remain in force with amended due dates and requirements as specified in the revised provisions.

5. The Board, in a public meeting, heard and considered all comments pertaining the discharge.

IT IS HEREBY ORDERED, pursuant to Section 13304 of the California Water Code, that the Discharger shall comply with the following:

C. AMENDED PROVISIONS

1. The Discharger shall comply with Provision C.1.j which is amended as follows:

TASKS AND COMPLETION DATES

j. TASK: IMPLEMENTATION OF SHALLOW ZONE REMEDIAL ALTERNATIVE(S)

Due Date: February 1, 1996
ADDITION: Submit a technical report acceptable to the Executive Officer documenting implementation of the groundwater extraction and treatment alternative selected for the site. The report shall summarize the design and operation of the treatment system, and provide a cumulative summary of groundwater sampling data, extraction volumes, and chemical mass removal estimates. Should the Discharger be able to demonstrate that the ongoing groundwater remediation system is not cost-effective and be unable to identify other or alternative cost-effective remedial technology to meet drinking water MCLs, the Discharger may perform a site-specific health-based risk assessment to evaluate the residual risk posed to human health and environment by any chemicals remaining in groundwater. Alternative cleanup levels and/or compliance points and risk management measures proposed by the Discharger shall be reviewed by the Board. However, if neither steady groundwater concentrations nor MCLs are reached by February 1, 1996, the Discharger may continue to operate the groundwater extraction and treatment system beyond that date.

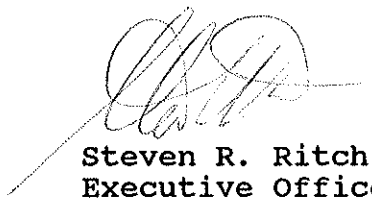
2. The Discharger is not required to submit quarterly reports provided that the revised Provision C.3 is followed. Therefore, Provision C.2 is hereby deleted.

3. The Discharger shall comply with the requirements of Provision 3, previously used, with the following amendment incorporated:

The Annual Reports shall contain much of the information that would have been contained in the former Monthly and Quarterly Reports, in addition to information regarding the effectiveness of the groundwater extraction and treatment system during the preceding year. This information shall include updated summaries of quarterly groundwater monitoring and treatment system sampling data, annual groundwater extraction volumes, and annual chemical mass extraction estimates. As necessary to report on significant site-specific changes including those in groundwater extraction and treatment system operation, groundwater flow conditions or groundwater chemical concentrations, that are observed during the course of a year, the Discharger shall supplement the Annual Reports by submitting Interim Reports detailing the observed changes. Any such interim reports shall be due by the end of the month following the aforementioned occurrences.

4. The Discharger is not required to submit monthly reports provided that the revised Provision C.3 referenced above is followed. Therefore, Provision C.4 is hereby deleted.

I, Steven R. Ritchie, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on November 19, 1993.



Steven R. Ritchie
Executive Officer